



CONWAY PRIMARY SCHOOL

Data Protection Policy

Approved by: Sandeep Singh
Sandeep Singh (May 24, 2022 12:09 GMT+1)

Date: 28th April 2022

Last reviewed on: April 2022

Next review due by: April 2025

CONTENTS

Background	Page 3
Our Commitment	Page 3
Responsibility for the Policy	Page 3
Personal Data	Page 4
The Principles of Data Protection	Page 4
The Data Protection Response	Page 4
Fair Processing / Privacy Notices	Page 5
The Data Controller and Data Protection Officer	Page 6
Subject Access Requests (Pupils)	Page 6
Subject Access Requests (Staff)	Page 7
Subject Access Requests (External)	Page 8
Disclosure to Third Parties	Page 8
The Right to be Forgotten	Page 9
Photographs and Videos	Page 9
Data Security	Page 9
Data Disposal	Page 10
Notification	Page 11
Data Breaches	Page 10
Complaints and Appeals	Page 11
Privacy Notice – Pupils	Annex A
Privacy Notice – Staff	Annex B
CCTV Policy	Annex C

Background

To ensure Conway Primary School is able to deliver its statutory functions it will collect and retain personal information about staff, pupils and other individuals who come into contact with the school. This information ensures effective management of the school and that it fulfil its obligations to the Local Authority, Department for Education, OfSTED and other external organisations. Personal data maybe collected and recorded using hard copy, electronic and other media. In addition to our legal obligations under Data Protection Act (DPA) and the General Data Protection Regulation (UK-GDPR), the school is committed to the correct handling of personal data as this will support school procedures and maintain the confidence of those with whom we deal.

Our Commitment

Conway Primary is committed to the protection of all personal and sensitive data for which it has responsibility as the Data Controller and the handling of such data in line with the DPA and the UK-GDPR

<https://ico.org.uk/for-organisations/guide-to-data-protection/>

Changes to data protection legislation will be monitored and implemented in order for the school to remain compliant with all requirements.

All member of the staff and governors are responsible for data protection. Specific accountability for data protection is the responsibility of Yalini Carlsson-Ruban (Head teacher and Data Controller) and Keith Robertson (School Business Manager and Data Protection Officer). To ensure data is handle appropriately all staff and governors are trained in their individual and organisational responsibilities.

The requirements set out in this policy are mandatory for all staff, governors and any third party contracted to provide services within the school.

Responsibility for the Policy

The School and Community Development Committee owns this policy on behalf of the governing body. However, the execution and the day-to-day procedures are delegated to the Head teacher and School Business Manager in their roles of Data Controller and Data Protection Officer respectively. The committee receives an annual report on the application of the policy from the Data Protection Officer and unless driven by other factors the committee will review the policy as part of its review schedule.

Personal Data

Personal data is defined under the UK-GDPR as information that relates to a living individual who can be identified from that data – the Data Subject, or from that data in addition to other information available to them. Personal data includes (but is not limited to) an individual's, name, address, date of birth, photograph, bank details and other information that identifies them.

The Principles of Data Protection

Conway Primary School fully endorses and adheres to the Principles of Data Protection, as detailed in Article 5 of the UK-GDPR, specifically that personal data is:

- a) Processed lawfully, fairly and in a transparent manner in relation to individuals
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- d) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the UK-GDPR in order to safeguard the rights and freedoms of individuals; and
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

Article 5(2) of the UK-GDPR also requires that:

“The Data Controller shall be responsible for, and be able to demonstrate, compliance with the principles.”

The Data Protection Response

Through the appropriate management and strict application of the data principles set out in the DPA and UK-GDPR Conway Primary School will:

- fully observe conditions regarding the fair collection and use of personal data
- meet our legal obligations to specify the purposes for which data is used
- collect and process appropriate data, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements
- ensure the quality of data used
- apply strict checks to determine the length of time data is held
- ensure that the rights of people about whom data is held, can be fully exercised under the UK-GDPR. (These include: the right to be informed that processing is being undertaken, the right of access to one’s personal data, the right to prevent processing in certain circumstances and the right to correct, rectify, block or erase information which is regarded as wrong information)
- take appropriate technical and organisational security measures to safeguard personal data
- ensure that personal data is not transferred abroad without suitable safeguards

- ❑ treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for data
- ❑ set out clear procedures for responding to requests for data
- ❑ everyone managing and/or handling personal data receives appropriate training and that they understand their contractual responsibilities for following good data protection practice
- ❑ only process data for the purposes for which it was obtained
- ❑ ensure that data processed is accurate
- ❑ not keep data longer than is necessary
- ❑ ensure that data is secure

All data within the school's control is identified as personal, sensitive or both to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the Data Subject.

The school's definition of personal and sensitive data is that defined by the Information Commissioner's Office (ICO):

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/key-definitions/#>

Fair Processing / Privacy Notice

Conway Primary School will be transparent about the intended data processing and retention and will communicate these intentions in writing to staff, parents and pupils (Annex A and B) and anyone else the school has a requirement to retain personal data on, prior to the commencement of the processing.

Notifications shall be in accordance with ICO guidance and, where relevant, will be written in a form understandable by those defined as 'Children' under the UK-GDPR.

There may be circumstances where the school is required either by law or in the best interests of our pupils or staff to pass information onto external authorities including but not limited to the Local Authority, Ofsted, Department for Education and the Department of Health and Social Care. Confirmation will be sought from any external organisation that they are compliant with the UK-GDPR before passing any data.

The intention and purpose of sharing data with another organisation will be clearly defined within written notifications with Data Subjects. Data will only be shared with external parties in circumstances where it is a legal obligation or other requirement to provide such information.

A Data Subject will be notified of any changes in the processing of their data. Under no circumstances will the school disclose pupil data:

- ❑ that would cause harm to the pupil's physical or mental health
- ❑ that would indicate a pupil is or has been subject to child abuse or may be at risk of it, where the disclosure is not in the best interests of the pupil
- ❑ that would allow another person to be identified or identifies another person as the source, unless the person is an employee of the school or the Local Authority or they give consent, or it is reasonable in the circumstances to disclose the information without consent. The exemption from disclosure does not apply if the information can be edited so that the person's name or identifying details are removed

- in the form of a reference given to another school or any other place of education and training, a pupil's potential employer, or any national body concerned with student admissions.

The Data Controller and Data Protection Officer

In line with the requirements of the DPA, the following individual has been appointed as the Data Controller for Conway Primary School:

Yalini Carlsson-Ruban
Email: admin@conway.greenwich.sch.uk
Tel: 020 8854 0897
Fax: 020 8331 0003
Contact Address: Conway Primary School
Gallosson Road
Plumstead
London
SE18 1QY

In line with the UK-GDPR, the following individual has been appointed the Data Protection Officer for Conway Primary School:

Keith Robertson
Email: admin@conway.greenwich.sch.uk
Tel: 020 8854 0897
Fax: 020 8331 0003
Contact Address: Conway Primary School
Gallosson Road
Plumstead
London
SE18 1QY

Subject Access Requests

All Subject Access Requests (SAR) should be made to the Data Protection Officer.

Subject Access Requests (Pupils)

A pupil can make a Subject Access Request (SAR) to see his/her own personal data and school record. There is no charge for a SAR from a pupil, it does not have to be in writing and any request will be completed within one month. Staff will judge whether the request is in the pupil's best interests, and whether the pupil will understand the information requested. Staff will also consider whether the request has been made under coercion or any other inappropriate actions by a third party. A record will be made of all decisions following a pupil's SAR.

A request for personal information can include unstructured as well as structured records – for example, letters, emails etc. not kept within a pupil's school record, or filed by their name, but still directly relevant to them.

Any pupil who requests to see their personal data has the right to question the accuracy of matters of fact within the data, and to ask to have inaccurate information deleted or changed. They may also question opinions, and their comments will be recorded, but opinions do not need to be deleted or changed as a part of this process.

A parent can make a SAR to view a copy of their child's school records and other personal information held about their child. This type of request must be made in writing but there is no charge for such requests on behalf of their child. Before responding to a SAR made by a parent, staff will check that no other legal obstruction is in force such as a court order limiting an individual's exercise of parental responsibility. In such cases, the additional court order will take precedence over the UK-GDPR.

Under the UK-GDPR, all rights regarding a pupil's personal data rests with the pupil as soon as they are old enough to understand these rights. This will vary from one pupil to another, but, based on accepted practice, most pupils over the age of 12 years are judged to have sufficient understanding of the concept of personal data. Parents are encouraged to discuss and explain the purpose of a SAR with their child if they are aged 12 or over.

Separate from the UK-GDPR, The Education (Pupil Information)(England) Regulations 2005 provide a parent (regardless of the age of the pupil) with the right to view, or to have a copy of, their child's educational record. Parents who wish to exercise this right must apply in writing to the Data Protection Officer.

Subject Access Requests (Staff)

Any member of staff at Conway Primary School can access to their own records at no charge, but the request must be made in writing to the Data Protection Officer. The member of staff has the right to see their own records, and to ask for copies of the records. There is no charge for copies of records.

The UK-GDPR requires that all requests for personal information are dealt with within 1 month of receipt. All requests will be acknowledged in writing on receipt, and access to records will be arranged within this timescale. If awaiting third party consents, the school will arrange access to those documents already available, and notify the individual that other documents may be made available later.

In all cases, should third party information (information about another individual) be included in the information the school will obtain permission to share this information with the Data Subject, with the exception of information provided by another member of school staff or the Local Authority, who are exempt from a requirement for third party consent. If third party permission is not obtained the school's Data Controller will consider whether the information can be released.

A SAR can include unstructured as well as structured records – for example, letters, emails etc. not kept within a Data Subject's HR files, or filed by their name, but still directly relevant to them.

Anyone who requests to see their personal data has the right to question the accuracy of matters of fact within the data, and to ask to have inaccurate information deleted or changed. They may also question opinions, and their comments will be recorded, but opinions do not need to be deleted or changed as a part of this process.

The school will document all requests for personal data with details of who dealt with the request, what information was provided and when, and any outcomes (letter requesting changes etc.) This will enable staff to deal with a complaint if one is made in relation to the request.

Subject Access Requests (External)

The UK-GDPR allows Data Subjects beyond those directly connected to an organisation to make a SAR in order to access personal information held by that organisation. Requests should be made in writing to the Data Protection Officer. On receipt of such a request, the school will provide information on where to access the information required or send the free information within 20 working days. The school's Data Controller will provide the applicant with details of the

relevant exemption if a request to provide information under a SAR is declined.

Disclosure to Third Parties

Personal data about pupils will not be disclosed to third parties without the consent of the pupil's parent or carer, unless it is obliged by law or in the best interest of the pupil. Data may be disclosed to the following third parties without consent:

Other schools

On transferring, a pupil's academic records and other data that relates to their health and welfare will be forwarded onto the new school. This will support a smooth transition and ensure that the pupil's needs and expectations are met.

Examination Authorities

Data can be disclosed for registration purposes, to allow the pupils to sit examinations set by external examination bodies.

Health Authorities

As obliged under health legislation, the school may pass information regarding the health of pupil in the school to monitor and avoid the spread of contagious diseases in the interest of public health.

Police and the Courts

If a situation arises where a criminal investigation is being carried out we the school will forward such data that will aid the Police investigation. The school will also pass data onto the Court Service when this is required.

Social Services and Support Agencies

In order to protect or maintain the welfare of pupils, and in cases of child abuse, it will be necessary to pass personal data on to Social Services and/or other support agencies.

Department for Education

Schools may be required to pass data on in order to help the government to monitor the national educational system and enforce laws relating to education.

Right to be Forgotten

Where any personal data is no longer required for its original purpose, an individual can demand that the processing is stopped and all their personal data is erased by the school including any data held by contracted processors.

Photographs and Video

Images of staff and pupils may be captured at appropriate times and as part of educational activities for use within the school.

Unless prior consent from parents/pupils/staff has been given, the school will not utilise such images for publication or communication to external sources including for use on the school's website or social media.

It is the school's policy that external parties (including parents) may not capture images of staff or pupils during such activities without prior consent.

Data Security

In order to assure the protection of all data being processed and inform decisions on processing activities, the school will undertake a risk assessment associated with the proposed processing arrangements including the impact on a Data Subject's privacy in holding data related to them.

Risk and Impact Assessments will be conducted in accordance with guidance provided by the ICO:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/?q=Risk+and+Impact+Assessments>

Data security will be achieved through the implementation of proportionate physical and technical measures including:

- ❑ Ensuring that all hard copy data is stored securely
- ❑ Ensuring that printouts of any personal or sensitive data are not left in printer trays or photocopiers
- ❑ Ensuring that all documents are properly shut down before leaving a computer unattended
- ❑ Ensuring public computers are not used to view sensitive data
- ❑ Password security including no sharing of passwords among staff and regularly changing passwords
- ❑ Ensuring all data held on local and external servers are password encrypted
- ❑ Ensuring cloud services are encrypted end to end and have a continuously audit

Sensitive and/or personal data should not be removed from the school site. The school acknowledges however that some staff may need to transport data between the school and their home in order to access it for work in the evenings and at weekends. This may also apply in cases where staff have offsite meetings, or are on school visits with pupils. The following requirements are in place for staff in order to reduce the risk of data being compromised when off site:

- ❑ Data will be routinely downloaded onto a password protected USB stick. The data will not be transferred from this USB stick onto a home or public computer; instead it will be edited from and saved to the USB stick. The USB Stick will be returned to the school as soon as is practicable.
- ❑ If it becomes necessary to remove hard copy data from the school, staff will ensure that it remains in the possession at all times and it is not disclosed to anyone who is not authorised to see it
- ❑ Whenever possible, staff will avoid using public transport when responsible for hard copy data

These requirements are clearly communicated to all school staff, and any intentionally breach will be handled as a disciplinary matter in line with relevant the school policy.

The security arrangements of any organisation with which data is shared by the school will also be considered. Organisations will be expected to provide evidence of their compliant data security procedures before the data is shared.

Data Disposal

The school recognises that the secure disposal of redundant data is an integral element to compliance with the UK-GDPR and an area of increased risk. All data disposal will meet recognised national standards in line with the school's Data Retention Schedule. Destruction details of all sensitive data will be recorded.

All electronic data will only be passed to a disposal partner with demonstrable competence in providing secure disposal services.

Disposal of IT assets holding data will comply with the ICO guidance:

https://ico.org.uk/media/for-organisations/documents/1570/it_asset_disposal_for_organisations.pdf

Hard copy data including relevant handwritten notes will be shredded at the point that which retention is no longer appropriate.

Notification

The school's data processing activities are registered with the ICO:

<https://ico.org.uk/about-the-ico/what-we-do/>

Changes to the type of data processing activities being undertaken by the school are notified to the ICO and details amended in the register.

Data Breaches

The Data Protection Officer is responsible for the effectiveness of the school's data protection arrangements and is required to report any breaches to the Data Controller immediately they are identified.

The Data Controller will report any breaches of personal or sensitive data the individual(s) concerned and the ICO within 72 hours of them being identified.

The school treats any data breach as a serious issue, potentially warranting a disciplinary investigation. The Data Controller and/or the Data Protection Officer will investigate each breach with each one being judged on their individual circumstances. They will be addressed accordingly through with the staff Code of Conduct and, where necessary, the school's Disciplinary Policy.

Details of any data breaches and any subsequent response are also reported to the Governing Body's School and Community Development Committee.

Complaints or Appeals

Complaints relating to the handling of personal data or appeals against a decision by the Data Controller should be referred to the Information Commissioner's Office.

email:	casework@ico.org.uk
Helpline:	0303 123 1113 (local rate) or 01625 545 745 (national rate)
Fax:	01625 524 510
Contact Address:	Information Commissioner's Office Wycliffe House

Water Lane
Wilmslow
Cheshire
SK9 5AF

Website :

www.ico.org.uk

Annex A

Privacy Notice (How we use pupil information)

At Conway Primary School, we are the Data Controller for the purposes of the Data Protection Act. We collect information from you and may receive information about you from your previous school. We hold this personal data and use it to:

Why we collect and use this information

We use the pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing

The categories of pupil information that we collect, hold and share include:

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment Information
- Relevant Medical Information
- Special Educational Needs Information
- Behaviour and Internal/External exclusion information

The lawful basis on which we use this information

We collect and use pupil information for general purposes

a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(d) Vital interests: the processing is necessary to protect someone's life.

(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

(f) The Education act 1996: for Departmental Censuses 3 times a year. More information can be found at:

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Collecting pupil information

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

Storing pupil data

We hold pupil data for 3 years after a pupil has left Conway Primary School

Who we share pupil information with

We routinely share pupil information with:

- schools that the pupil's attend after leaving us
- the local authority
- the Department for Education (DfE)
- school nurses
- social services
- NHS
- police

Why we share pupil information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so. We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our pupils with the Local Authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information about Individual Pupils) (England) Regulations 2013.

Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

Law requires us, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information about Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact DfE: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact **Keith Robertson (Data Protection Officer)** krobertson@conway.greenwich.sch.uk or on 020 8854 0897

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

We will not give information about you to anyone outside the school without your consent unless the law and our rules permit it. We are required by law to pass some of your information to the Local Authority (LA) and the Department for Education (DfE).

Contact

If you would like to discuss anything in this privacy notice, please contact:

Keith Robertson (Data Protection Officer) krobertson@conway.greenwich.sch.uk or on 020 8854 0897

If you require more information about how the LA and/or DfE store and use this data please go to the following websites:

http://www.royalgreenwich.gov.uk/info/100005/education_and_learning

<https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>

If you are unable to access these websites, please contact the LA or the DfE using the following contact details:

Information, Research and Statistics Team:

Children's Services, Greenwich Council
3rd Floor, The Woolwich Centre, 35 Wellington Street
London SE18 6HQ
Telephone: 020 8854 8888
Website: www.greenwich.gov.uk
Email: contact-centre@greenwich.gov.uk

Public Communications Unit:

Department for Education Sanctuary Buildings Great Smith Street London SW1P 3BT
Telephone: 0370 000 2288
Website: www.education.gov.uk
Email: <http://www.education.gov.uk/help/contact>

We at Conway Primary School are the Data Controller for the purposes of the Data Protection Act. Personal data is held by the school about those employed or otherwise engaged to work at the school or Local Authority. This is to assist in the smooth running of the school and/or enable individuals to be paid. The collection of this information will benefit both national and local users by:

The categories of school workforce information that we collect, process, hold and share include:

- personal information (such as name, employee or teacher number, national insurance number)
- special categories of data including characteristics information such as gender, age, ethnic group
- contract information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- medical information
- addresses – Previous and current
- bank account details
- national insurance details
- references from previous employment
- performance reviews & outcomes
- support plan reviews & outcomes

Why we collect and use this information

We use school workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid
- enable personal and professional development activities

The lawful basis on which we process this information

We process this information under:

(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(d) Vital interests: the processing is necessary to protect someone's life.

(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

We process personal data relating to those we employ to work as, or are otherwise engaged to work as, part of our child and family social care workforce. We do this is for employment purposes, to assist in the running of the authority and/or to enable individuals to be paid. The collection of this information will also benefit both national and local users by:

- improving the management of workforce data across the sector

- enabling development of a comprehensive picture of the workforce and how it is deployed
- informing the development of recruitment and retention policies
- allowing better financial modelling and planning
- enabling monitoring of selected protected characteristics

The personal data includes identifiers such as Name, Date of Birth, HCPC number, Personal characteristics such as gender and ethnic group, qualifications and absence information.

We will not share information about you with third parties without your consent unless the law allows or requires us to. We are required to share some of your personal data with:

- the Department for Education (DfE)

If you require more information about how DfE store and use your personal data please visit:

- <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Collecting this information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

Storing this information

We hold school workforce data for seven years after termination of employment.

Who we share this information with

We routinely share this information with:

- our local authority
- the Department for Education (DfE)

Why we share school workforce information

We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

Local authority

We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Department for Education (DfE)

We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment.

We are required to share information about our school employees with our local authority (LA) and the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Data collection requirements

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil

Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

To contact the department: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact Keith Robertson (Data Protection Officer) in writing at kr Robertson@conway.greenwich.sch.uk or on xtn 1104

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

We will not give information about you to anyone outside the school or Local Authority (LA) without your consent unless the law and our rules allow us to.

Further information

If you would like to discuss anything in this privacy notice, please contact:

KEITH ROBETSON

Data Protection Officer



CONWAY PRIMARY SCHOOL

CLOSED CIRCUIT TV POLICY (CCTV)



CONWAY PRIMARY SCHOOL

CCTV Policy

Definitions

"the school" – Conway Primary School

"Data Controller"- The school's Data Controller for CCTV is Mrs Yalini Carlsson-Ruban

"Data Protection Officer"- The school's Data Protection Office for CCTV is Mr Keith Robertson

"Site Manager"- The school's Site Manager.

"CCTV Operator"- Employees of the school with the skills and permission to operate the CCTV and retrieve footage.

Introduction

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at the school. The system comprises a number of static cameras located around the school site. All cameras can be monitored from the Main Reception.

This Code follows the General Data Protection Regulation May 2018

The CCTV system and data is owned by the school.

Objectives of the CCTV system

To protect the school buildings and assets of the school.

To increase personal safety and reduce the fear of crime.

To support the Police in a bid to deter and detect crime.

To assist in managing the school.

Statement of intent

The CCTV system will be registered with the Information Commissioner under the terms of the General Data Protection Regulation May 2018 and will seek to comply with the requirements both of the Data Protection Act and Commissioner's Code of Practice.

The school will treat the system and all information, documents and recordings obtained and used, as data which are protected by the General Data Protection Regulation.

The system installed is compliant with the General Data Protection Regulation and, Human Rights Act and Regulatory Investigation Powers Act.

Cameras will be used to monitor activities within the school and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school and its staff, students and visitors. Cameras are focussed on the school buildings and around entrances/exits.

Materials of knowledge secured as a result of CCTV will not be used for any commercial purpose. Information transferred to CD/DVD (or other appropriate media) will only be used for the investigation of a specific crime or incident. Release to the media would only be allowed with the written authority of the police if this was required by them as part of a police investigation.

Warning signs, as required under the Data Protection Act, have been placed at key points in the building.






Data Protection Policy 2022

Final Audit Report

2022-05-24

Created:	2022-05-23
By:	Keith Robertson (krobertson@conway.greenwich.sch.uk)
Status:	Signed
Transaction ID:	CBJCHBCAABAAWdq1vZCZKorQsxMmM-uxli4NkFhuL-KE

"Data Protection Policy 2022" History

-  Document created by Keith Robertson (krobertson@conway.greenwich.sch.uk)
2022-05-23 - 12:16:21 PM GMT
-  Document emailed to Sandeep Singh (sandy_kfk@yahoo.com) for signature
2022-05-23 - 12:16:50 PM GMT
-  Email viewed by Sandeep Singh (sandy_kfk@yahoo.com)
2022-05-24 - 11:08:02 AM GMT
-  Document e-signed by Sandeep Singh (sandy_kfk@yahoo.com)
Signature Date: 2022-05-24 - 11:09:06 AM GMT - Time Source: server
-  Agreement completed.
2022-05-24 - 11:09:06 AM GMT